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April 30, 2004

RECEIVED

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PUBLIC SERVICE  
COMMISSION

Hon. Thomas M. Dorman  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
P. O. Box 615  
Frankfort, KY 40601

**Re: Request for Production of Documents and Information and Data Requests,  
Case No. 2004-00036**

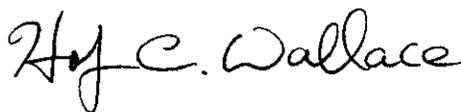
Dear Mr. Dorman:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky is one original and eleven (11) copies of Ballard Rural Telephone Cooperative Corporation's Request for Production of Documents and Information and Data Requests. Please file stamp one of the enclosed eleven copies and return it to me in the enclosed self-addressed stamped envelope.

Thank you, and if you have any questions, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosure

90122v1  
31471-1



**REQUEST NO. 2:** Please produce any and all documents which evidence, relate, or refer to Jackson Purchase's decision to increase the pole attachment rates it charges Ballard Telephone.

**RESPONSE:**

**REQUEST NO. 3:** Please produce any and all documents which evidence, relate or refer to the economic factors identified by Richard Sherrill in answer number 23 of his testimony which was filed with the Public Service Commission on April 7, 2004.

**RESPONSE:**

**REQUEST NO. 4:** Please produce any and all documents, including, but not limited to insurance claims, which evidence, relate or refer to the subjective costs identified by Richard Sherrill in answer number 23 of his testimony which was filed with the Public Service Commission on April 7, 2004.

**RESPONSE:**

**REQUEST NO. 5:** Please produce any and all documents which evidence, relate or refer to the negotiations between Jackson Purchase and Ballard Telephone with respect to Jackson Purchase's decision to increase the pole attachment rates which it charges to Ballard Telephone.

**RESPONSE:**

**REQUEST NO. 6:** Please produce any and all documents which evidence, relate or refer to the cost study used to prepare the current tariffed CATV pole attachment rate.

**RESPONSE:**

**REQUEST NO. 7:** Please produce any and all documents which evidence, relate or refer to any consideration by Jackson Purchase to enter the local exchange carrier marketplace as a provider of local exchange carrier services.

**RESPONSE:**

**REQUEST NO. 8:** Please produce any and all documents which evidence, relate or refer to any consideration by Jackson Purchase to enter the cable television marketplace.

**RESPONSE:**

**REQUEST NO. 9:** Please produce any and all documents which evidence, relate or refer to any consideration by Jackson Purchase to enter the satellite communications marketplace.

**RESPONSE:**

**INFORMATION AND DATA REQUESTS**

**REQUEST NO. 10:** State each and every reason for which Jackson Purchase decided to increase the pole attachment rates of Ballard Telephone.

**RESPONSE:**

**REQUEST NO. 11:** Please provide both a detailed explanation and a detailed quantification of the subjective costs identified by Mr. Richard Sherrill in answer number 23 of his testimony filed with the Public Service Commission on April 7, 2004.

**RESPONSE:**

**REQUEST NO. 12:** Please provide a complete definition of what Jackson Purchase considers a joint-use pole.

**RESPONSE:**

**REQUEST NO. 13:** Does Jackson Purchase provide pole attachments to cable television companies?

**RESPONSE:**

**REQUEST NO. 14:** If so, please identify the cable television companies and state the number of utility poles of Jackson Purchase occupied by each of the cable television companies.

**RESPONSE:**

**REQUEST NO. 15:** Please identify the rates charged these cable television companies which are identified in response to Request No. 14.

**RESPONSE:**

**REQUEST NO. 16:** State each and every reason for which these rates (identified in response to Request No. 15) are different than the rates Jackson Purchase proposes to charge Ballard Telephone.

**RESPONSE:**

**REQUEST NO. 17:** Please state the number of Jackson Purchase utility poles occupied by any Tennessee Valley Authority cooperatives.

**RESPONSE:**

**REQUEST NO. 18:** Please state the number of Jackson Purchase utility poles occupied by BellSouth Telecommunications, Inc.

**RESPONSE:**

**REQUEST NO. 19:** Please explain in detail the reasons for which cable television companies cannot erect their own poles upon which to place their own facilities.

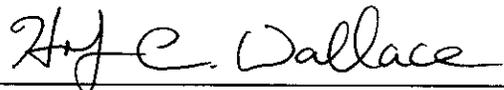
**RESPONSE:**

**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing was served by mailing a copy of the same via Federal Express, postage prepaid, to the following individuals this 30<sup>th</sup> day of April, 2004:

W. David Denton  
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P.O. Box 929  
Paducah, KY 42002-0929

G. Kelly Nuckols  
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**COUNSEL TO BALLARD RURAL  
TELEPHONE COOPERATIVE  
CORPORATION, INC.**